

February 9, 2015

**VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Brazos Telephone Cooperative, Inc., please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to 47 C.F.R. §64.2009(e).

Please contact me at 512-652-7725 if you have any questions or need further information.

Sincerely,



Lynette Hampton  
Authorized Representative for  
Brazos Telephone Cooperative, Inc.

LH/pjf

Attachments

cc: Mr. Lonnie Rue, Brazos Telephone Cooperative, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering prior calendar year 2014

Date filed: February 9, 2015

Name of Cooperative covered by this certification: **Brazos Telephone Cooperative, Inc.**

Form 499 Filer ID: 802158

Name of signatory: Lonnie Rue

Title of signatory: CEO/General Manager

I, Lonnie Rue, certify that I am an officer of the Cooperative named above, and acting as an agent of the Cooperative, that I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Cooperative has not taken any actions (proceedings instituted or petitions filed by a Cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Cooperative is not aware of any attempts by pretexters to access the CPNI of Cooperative customers and therefore, has not had to take any actions against data brokers.

The Cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Cooperative represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The Cooperative also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
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Attachment: Accompanying Statement explaining CPNI procedures



### ACCOMPANYING STATEMENT

This statement explains how Brazos Telephone Cooperative, Inc.'s ("the Cooperative's") procedures ensure compliance with the FCC rules on CPNI and FCC requirements for the safeguarding of such customer information.

Under the Cooperative's operating procedures, disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Cooperative has an express disciplinary process in place, and any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F.R. §64.2010, including, but not limited to the following: Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls, during business office visits, or through online account access. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords has been implemented. Passwords and back-up authentication procedures are established in accordance with § 64.2010(e). Authentication procedures for customers prior to allowing customer access to online account CPNI have been established in compliance with §64.2010(c). The Cooperative has implemented procedures to notify customers immediately whenever a password, customer response to a back-up authentication questions for lost or forgotten passwords, online account, or address of record is created or changed. When an address of record is changed the notification is mailed to the prior address of record.

The Cooperative provides notice to the customer of their right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Cooperative is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Cooperative. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval.

Brazos Telephone Cooperative, Inc.  
2015 CPNI Certification Covering 2014

The Cooperative requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Cooperative has no joint venture partner and does not release CPNI to any third parties for marketing purposes.

The Cooperative has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Cooperative's CPNI responsibilities and questions related to CPNI policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Cooperative employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules, including records of any discovered breaches, notifications of breaches to law enforcement, as well as law enforcements' responses to the notifications, for a period of at least two years.